

Samuel A. Schwartz, Esq.  
Nevada Bar No. 10985  
Bryan A. Lindsey, Esq.  
Nevada Bar No. 10662  
Schwartz Flansburg PLLC  
6623 Las Vegas Blvd. South, Suite 300  
Las Vegas, Nevada 89119  
Telephone: (702) 385-5544  
Facsimile: (702) 385-2741  
Attorneys for the Chapter 7 Trustee, Victoria L. Nelson

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

In re:	)	Case No. 2:16-cv-00060-JAD-GWF
	)	
AMERI-DREAM REALTY, LLC,	)	
	)	Bankruptcy Case No.: 15-10110-LED
Debtor.	)	
	)	Chapter 7
<hr/> VICTORIA NELSON, In Her Capacity As The	)	
Chapter 7 Trustee Of AMERI-DREAM	)	
REALTY, LLC,	)	
Plaintiff,	)	
	)	Adv. Proceeding No.: 15-01183-LED
v.	)	
	)	
XL AMERICA, INC.; XL INSURANCE	)	<b>STIPULATION AND ORDER</b>
AMERICA, INC.; XL SELECT	)	<b>CONTINUING BRIEFING</b>
PROFESSIONAL; PEARL INSURANCE	)	<b>DEADLINES</b>
GROUP, LLC; GREENWICH INSURANCE	)	
COMPANY; and DOES I through X; and ROE	)	
CORPORATE DEFENDANTS XI through	)	
XX,	)	
Defendants.	)	
<hr/>	)	

Plaintiff, Victoria Nelson, in her capacity as the Chapter 7 Trustee of Ameri-Dream Realty, LLC (the “**Plaintiff**”), by and through her attorneys of record Schwartz Flansburg PLLC, and XL America, Inc., XL Insurance America, Inc., XL Select Professional, Pearl Insurance Group, LLC, Greenwich Insurance Company (collectively, the “**Defendants**”), by and through

1 their attorneys of record, Wilson Elser Moskowitz Edelman & Dicker LLP, hereby stipulate and  
2 agree as follows:

3 WHEREAS, on November 15, 2016, this Court entered an order granting Defendants'  
4 motion to withdraw the reference from bankruptcy court to this Court;

5 WHEREAS, on December 22, 2016, the Plaintiff filed her Motion for Summary  
6 Judgment (the "**MSJ**") against all Defendants;

7 WHEREAS, on December 27, 2016, the Defendants XL America, Inc., XL Insurance  
8 America, Inc., XL Select Professional and Pearl Insurance Group, LLC filed their Motion to  
9 Dismiss the Complaint, and that same day, Defendant Greenwich Insurance Company filed its  
10 Motion to Dismiss the Complaint (collectively, the "**MTDs**");

11 WHEREAS, the current deadline for Plaintiff to file an opposition to the MTDs is  
12 January 10, 2017, and the deadline for Defendants to file an opposition to the MSJ is January  
13 12, 2017; and

14 WHEREAS, the parties desire to extend the briefing deadlines as set forth herein.

15 NOW, THEREFORE, the Plaintiff and Defendants hereby stipulate and agree to the  
16 following, and concurrently seek this Court's approval of the same.

17 IT IS HEREBY STIPULATED AND AGREED that Plaintiff's deadline to file an  
18 opposition to the MTDs shall be January 13, 2017; and

19 IT IS FURTHER STIPULATED AND AGREED that Defendants' deadline to file an  
20 opposition to the MSJ shall be January 17, 2017; and

21 IT IS FURTHER STIPULATED AND AGREED that Defendants' deadline to file a  
22 reply to Plaintiff's opposition to the MTDs shall be two weeks after the opposition is filed, or  
23 January 27, 2017; and  
24  
25  
26

1 IT IS FURTHER STIPULATED AND AGREED that Plaintiff's deadline to file a reply  
2 to Defendants' opposition to the MSJ shall be two weeks after the opposition is filed, or January  
3 31, 2017.

4 Date: January 9, 2017

5 By: /s/ Samuel A. Schwartz  
6 Samuel A. Schwartz, Esq.  
Nevada Bar No. 10985  
7 Bryan A. Lindsey, Esq.  
Nevada Bar No. 10662  
8 Schwartz Flansburg PLLC  
6623 Las Vegas Blvd. South, Suite 300  
9 Las Vegas, Nevada 89119  
Telephone: (702) 385-5544  
10 Facsimile: (702) 385-2741  
11 Attorneys for the Plaintiff

Date: January 9, 2017

By: /s/ Jennifer W. Arledge  
Jennifer W. Arledge, Esq.  
Nevada Bar No. 8729  
Wilson Elser Moskowitz Edelman &  
Dicker LLP  
300 South 4th Street - 11th Floor  
Las Vegas, NV 89101-6014  
Telephone: (702) 727-1400  
Facsimile: (702) 727-1401  
Attorneys for Defendants

12  
13 **IT IS SO ORDERED.**

14 Dated: January 9, 2016.

15  
16   
17

UNITED STATES DISTRICT JUDGE

18  
19 Submitted by:

20 Schwartz Flansburg PLLC

21 By: /s/ Samuel A. Schwartz  
22 Samuel A. Schwartz, Esq.  
Nevada Bar No. 10985  
23 Bryan A. Lindsey, Esq.  
Nevada Bar No. 10662  
24 6623 Las Vegas Blvd. South, Suite 300  
Las Vegas, Nevada 89119  
25 Attorneys for Plaintiff  
26